

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GEORGE TANG,

Plaintiff

v.

ORACLE AMERICA, INC.

Defendant

C.A. No. 1:12-cv-10193-LTS

JOINT MOTION TO STAY PROCEEDINGS

The parties hereby jointly request that the Court stay all proceedings in this action, pending the outcome of binding arbitration proceedings between the parties. As grounds therefore, the parties state as follows:

1. The claims asserted by Plaintiff George Tang (“Plaintiff”) in the above-captioned action are covered by the provisions of a mandatory arbitration agreement that he signed at the commencement of his employment at Defendant Oracle America, Inc. (“Defendant”).
2. Plaintiff stipulates that he is required by the terms of the mandatory arbitration agreement to submit the present dispute for binding resolution before a private arbitrator.
3. The Arbitration process will address all of the claims asserted by Plaintiff in this matter.
4. The Parties agree that the discovery allowed in the arbitration process shall include all discovery permitted by the Federal Rules of Civil Procedure, and all remedies that would have been available to Plaintiff in Court will be available to him in the arbitration proceeding.

WHEREFORE, the parties jointly move that this Court issue an Order staying this action until the completion of the arbitration proceedings, pursuant to the stipulations herein.

GEORGE TANG

/s/ David B. Stein

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Dated: March 23, 2012

ORACLE AMERICA, INC.
By its attorneys,

/s/ Gregory A. Manousos

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2012, I filed the foregoing document via the ECF system, and thereby served counsel of record for Plaintiff, David B. Stein, Esquire, Kajko, Weisman, Colasanti & Stein, LLP, 430 Bedford Street, Suite 190, Lexington, MA 02420.

/s/ Gregory A. Manousos

Gregory A. Manousos